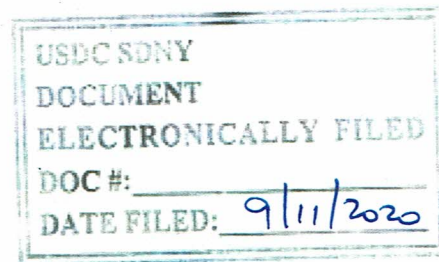


MEMO ENDORSED



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August 18, 2020

Via ECF
The Honorable Nelson S. Roman
United States District Judge
United States Courthouse
300 Quarropas Street, Room 218
White Plains, NY 10601

Defendant Maurice Ellis's (02) request is granted without objection from the Government or co-Defendant Isaac Mallory (03). Clerk of the Court requested to terminate the motion (doc. 119).

Dated: Sept. 11, 2020

SO ORDERED.

Nelson S. Román, U.S.D.J.

RE: *United States v. Willie Sims, (Maurice Ellis)*
19-cr-857 (NSR) -02

Dear Judge Roman:

I was appointed as counsel for defendant, Maurice Ellis, pursuant to the Criminal Justice Act (CJA) on October 3, 2019. I am writing to seek leave to join in counts 2 through 5 of the Omnibus Motions of Mr. Ellis' co-defendant, Isaac Mallory, filed on July 8, 2020, set forth in documents 97 and 100 in the docket. Due to COVID-19, since March of this year, I have been unable to meet with my client in person, and our communications have been limited to the telephone or to video conferences that we can schedule for a limited time. As such, our ability to effectively communicate and to review the discovery in this matter together has been compromised. As a result, I misconstrued Mr. Ellis' position on a certain matter in this case. Therefore, I am seeking permission to join in the motions filed on behalf of Mr. Mallory (except for the suppression motion). I have spoken with Patrick Joyce, the attorney for Mr. Mallory, and Shiva Logarajah, AUSA, on behalf of the government, and neither have an objection to this request. The government's response to Mr. Mallory's pretrial motions is due a week from today, on August 25, 2020. I have advised Mr. Logarajah of our intention to seek leave to join in the counts of the motion set forth above (counts 2 -5), and Mr. Logarajah acknowledged that his

response to the motions would not change if Mr. Ellis were to join. Therefore, the government would not be prejudiced if Your Honor were to grant this request. Accordingly, Mr. Ellis respectfully requests permission to join in the Omnibus Motions, counts 2 through 5, of co-defendant Isaac Mallory. Your Honor's time and consideration of the foregoing request is greatly appreciated.

Respectfully Submitted,
s/
Lorraine Gauli-Rufo, Esq.
CJA Attorney for Maurice Ellis

cc: All counsel of record